



NAFDPIR 2004



**Certification
Workshop**



FY 2002-2003 Management Evaluation Findings



FY 2002-2003 Management Evaluations

Top 10 Certification Problems



Top 10 Certification Problem Areas #10

Advising
households of
responsibility to
report changes

FY 2002
10%

FY 2003
0%





Advising Households of Responsibility to Report Changes

● **Households must report changes within 10 days from when the change becomes known:**

- **Household composition**
- **Increase in resources**
- **Increase in income**

(FNS Handbook 501, Section 5141)





Advising Households of Responsibility to Report Changes

- **ITO's must advise households of reporting requirement at interview**

(FNS Handbook 501, Section 3600)

- **Changes may be reported by:**
 - **Telephone or in person**
 - **Change report form**

(FNS Handbook 501, Section 5143)





Advising Households of Responsibility to Report Changes

● **Failure to report changes may result
in:**

- Overissuance claim**
- Disqualification for Intentional
Program Violation**

(FNS Handbook 501, Section 5153)





Top 10 Certification Problem Areas #9

Clear and
comprehensive
application and
worksheet

FY 2002

0%

FY 2003

14%





Clear and Comprehensive Application and Worksheet

- **Application should be understandable and easy to complete**
- **Must include description of violations and non-discrimination statement**

(FNS Handbook 501, Section 3110)





Top 10 Certification Problem Areas #8

Training certifiers
on changes in
policy and
procedures

FY 2002
15%

FY 2003
10%





Training Certifiers on Changes in Policy and Procedures

- ITO's are required to have a continuing training program that includes changes in policy and procedures

(FNS Handbook 501, Section 1231)





Top 10 Certification Problem Areas

#7

Proper treatment
of fluctuating
income

FY 2002

10%

FY 2003

19%






Proper Treatment of Fluctuating Income

● Income may fluctuate under the following conditions:

- seasonal employment;
- hourly wages;
- contract employment;
- self-employment;
- educational income;

(FNS Handbook 501, Sections 4611, 4614, 4622-4623, 4725)






Proper Treatment of Fluctuating Income

- Only count income that is reasonably expected to be received by the household
 - Look at past income, if applicable
 - If contract, self-employment or educational income, then average the anticipated income over the period it is intended
 - Optional—if income is close to the limit and fluctuating, then average, if not a disadvantage to household
-



Top 10 Certification Problem Areas #6

	<u>FY 2002</u>	<u>FY 2003</u>
Documentation of membership in a Federally recognized tribe	20%	10%





Documentation of Membership in a Federally Recognized Tribe

- In Oklahoma and in near areas off reservations, ITOs must determine if household qualifies as Indian Tribal Household
- At certification and each recertification, document the case file with information on tribal affiliation


(FNS Handbook 501, Section 4212)





Top 10 Certification Problem Areas #5

	<u>FY 2002</u>	<u>FY 2003</u>
Assignment of certification periods that are appropriate to the household's circumstances	30%	10%





Assignment of Certification Periods that are Appropriate to the Household's Circumstances

- **Stable households = longer cert periods**
- **Unstable households = shorter cert periods**
- **Must consider all household circumstances, not just income**

(FNS Handbook 501, Section 5110)





Top 10 Certification Problem Areas #4

Documentation of
unearned income

FY 2002
30%

FY 2003
14%





Documentation of Unearned Income

- All unearned income must be documented
- New documentation must be obtained at every recertification

(FNS Handbook 501, Sections 3530-3539)





Top 10 Certification Problem Areas

#3

Full month's wage
statements to
document earned
income

FY 2002

35%

FY 2003

14%





Full Month's Wage Statements to Document Earned Income

- Households with earned income must provide a full month's wage statements
- If full month is not available, use what is available and verify through collateral contact with employer
- Document file with copies of wage statements and information obtained from employer

(FNS Handbook 501, Section 3530)





Top 10 Certification Problem Areas #2

Documentation of
zero income

FY 2002
40%

FY 2003
17%





Documentation of Zero Income

- There may be legitimate situations that result in a household receiving no income
- Recommend use of household declaration of zero income form (see sample)
- Assign short certification periods


(FNS Handbook 501, Section 3530)






Top 10 Certification Problem Areas #1

	<u>FY 2002</u>	<u>FY 2003</u>
Other documentation that supports the eligibility determination	30%	29%





Other Documentation that Supports the Eligibility Determination

- Completed and signed application and worksheet
 - Lack of explanatory notes in the file
 - Copies of completed notices:
 - eligibility
 - denial
 - expiration of certification
 - adverse action
- 



Other Documentation that Supports the Eligibility Determination

- Documentation for Medicare Part B and child support deductions
- Documentation of check for dual participation

(FNS Handbook 501, Section 3539)




FY 2002-2003 Management Evaluations

Dual Participation




Dual Participation

	1997 OIG Audit	FY 2002 MEs	FY 2003 MEs
Number of reviews that found dual participation	11	3	3
Percentage of reviews	37%	15%	7%






Dual Participation

- **Develop good working relationship with FSP and other FDPIR programs in your area**
 - **Establish Memorandum of Agreement to assist each other in preventing dual participation**
 - **Share participation lists with FSP on a monthly basis**
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Dual Participation

- Share participation lists with other FDPIR programs in your area
 - Call FSP or other FDPIR offices when reviewing applications to verify non-participation in those programs
 - Fax verification of non-receipt of FSP benefits form (see sample) to FSP or other FDPIR programs
- 



Dual Participation

- Document the case file on the method used to verify non-participation in FSP and other FDPIR programs in your area:
 - Copy of verification of non-receipt of FSP benefits form (see sample)
 - Notation in case file – Date; name of person you spoke with; identify participation lists you checked
- 


FY 2002-2003 Management Evaluations

Inventory Control




Inventory Control

	1997 OIG Audit	FY 2002 MEs	FY 2003 MEs
Percentage of reviews that found out-of-date commodities	93%	20%	29%






Out of Date Commodities

- FNS has discontinued use of Best-If-Used-By Dates
 - FNS-HQ issued new guidance on April 22, 2004
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Out of Date Commodities

- Check inventory coming in
 - Practice first in, first out (mark pallets with date received)
 - Maintain proper storage conditions
 - Avoid excessive inventories
- 

Exercise Time!

